



## U.S. Department of Justice

*United States Attorney  
Northern District of Mississippi*

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March 10, 2022

Honorable William F. Travis  
8619 Hwy 51 N  
Southaven, MS 38671-3635

Honorable Paul Chiniche  
1200 Jefferson Avenue  
Oxford, MS 38655

Honorable Goodloe Lewis  
Hickman, Goza, and Spragins  
1305 Madison Avenue  
Oxford, MS 38655

Re: United States v. Thomas Iroko Ayodele et al.  
NDMS Criminal No. 3:21-CR-107

Dear Bill, Goodloe and Paul:

As a follow-up to my previous discovery correspondence, I would designate Chris Moody as an expert witness in the field of communications intercept and analysis. Chris is with the Technical Services Unit of the U.S. Postal Inspection Service. I have enclosed a copy of his CV. I would anticipate Chris testifying in regard to the analysis of the geofence and other cellular location information gathered during the course of this investigation, to include explanation and analysis of the maps generated by the U.S. Postal Inspection Service showing the location of the defendants and their cellular phones before, during and after the time of the subject robbery.

If you have any questions, please let me know.

Very truly yours,

CLAY JOYNER  
United States Attorney

By:  
ROBERT J. MIMS  
Assistant United States Attorney

Enclosures